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   Attorneys for Plaintiff SYNOPSYS, INC.
6  and for Defendants AEROFLEX INCORPORATED,
   AEROFLEX COLORADO SPRINGS. INC.,
7  AMI SEMICONDUCTOR, INC.,
   MATROX ELECTRONIC SYSTEMS, LTD.,
8  MATROX GRAPHICS INC.,
   MATROX INTERNATIONAL CORP.,
9  and MATROX TECH, INC.

10                 UNITED STATES DISTRICT COURT

11                NORTHERN DISTRICT OF CALIFORNIA

12                  SAN FRANCISCO DIVISION

13

14  RICOH COMPANY, LTD.,

15          Plaintiff,                        Case No. C03-04669 MJJ (EMC)

16      vs.                                   Case No. C03-02289 MJJ (EMC)

17  AEROFLEX INCORPORATED, AMI                **JOINT STIPULATION AND REQUEST TO**
    SEMICONDUCTOR, INC., MATROX               **MODIFY SECOND AMENDED PRETRIAL**
18  ELECTRONIC SYSTEMS LTD., MATROX           **ORDER; [PROPOSED] ORDER**
    GRAPHICS INC., MATROX                     **MODIFYING SECOND AMENDED**
19  INTERNATIONAL CORP., MATROX TECH,         **PRETRIAL ORDER**
    INC., AND AEROFLEX COLORADO
20  SPRINGS, INC.

21          Defendants.

22  SYNOPSYS, INC.,

23          Plaintiff,

24      vs.

25  RICOH COMPANY, LTD.,

26          Defendant.

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   **JOINT STIPULATION AND REQUEST TO MODIFY SECOND**
   **AMENDED PRETRIAL ORDER; [PROPOSED] ORDER**
   HOWREY
   LLP   Case Nos. 03-04669 MJJ (EMC) and 03-02289 MJJ (EMC)
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1      Ricoh Company, Ltd., Synopsys, Inc. and Defendants Aeroflex, Incorporated, Aeroflex

2  Colorado Springs, Inc., AMI Semiconductor, Inc., Matrox Electronic Systems, Ltd., Matrox Graphics,

3  Inc., Matrox International Corp., and Matrox Tech, Inc. hereby stipulate to proposed schedule, and

4  request that the Court modify its Second Amended Pretrial Order in accordance with the stipulated

5  proposed schedule.

6      On July 13, 2005, the Court conducted a Case Management Conference.  During the Case

7  Management Conference, trial setting and scheduling were discussed, and the parties proposed various

8  case schedules.  Thereafter, on July 25, 2005, the Court entered a Second Amended Pretrial Order.

9  The Second Amended Pretrial Order sets the trial to commence on July 24, 2006, and sets various

10 pretrial deadlines.  Based on the progress of the case to date, the parties file this Stipulation requesting

11 a modification of the Second Amended Pretrial Order.

12     **WHEREAS** discovery in this matter has progressed more slowly than anticipated, with more

13 than 4 million pages of documents being produced by Plaintiff Synopsys, Inc. and Defendants

14 Aeroflex, Incorporated, Aeroflex Colorado Springs, Inc., AMI Semiconductor, Inc., Matrox Electronic

15 Systems, Ltd., Matrox Graphics, Inc., Matrox International Corp., and Matrox Tech, Inc.

16 ("Defendants") since the discovery stay was lifted on July 22, 2005;

17     **WHEREAS** no depositions (other than those relating to the Defendants' 35 U.S.C. § 271(g)

18 motion) have taken place since the discovery stay was lifted;

19     **WHEREAS** the depositions Ricoh intends to take are now scheduled to begin in December and

20 continue through mid-February, and the depositions that Synopsys and Defendants intend to take have

21 not yet been requested or scheduled;

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**JOINT STIPULATION AND REQUEST TO MODIFY SECOND**      2
**AMENDED PRETRIAL ORDER; [PROPOSED] ORDER**

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**IT IS HEREBY STIPULATED AND AGREED** by and between Ricoh Company, Ltd. and

2
Defendants that the case schedule be changed to the following:

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| DATE | DEADLINE/TASK |
|---|---|
| 3/24/2006 | Final Infringement Contentions due |
| 4/17/2006 | Last day to propound infringement-related discovery |
| 4/24/2006 | Final Invalidity Contentions due |
| 5/30/2006 | Close of fact discovery (responses due by this date) |
| 6/7/2006 | Last day to file discovery motions |
| 6/19/2006 | Opening expert reports due |
| 7/19/2006 | Rebuttal expert reports due |
| 8/18/2006 | Dispositive motions due |
| 8/18/2006 | Close of expert discovery |
| 9/27/2006 | Dispositive motion hearing |
| 10/2006 | Settlement conference with Judge Spero |
| 11/13/2006 | Pretrial conference |
| 11/27 – 12/15/2006 | Trial |

12

13    The parties request that the Court modify its Second Amended Pretrial Order to adopt the dates

14    set forth above, or if the trial date is inconvenient for the Court, such other date as may be convenient

for the Court.

15    Dated:  November 16, 2005

16
                                     HOWREY LLP

17
                                     By: /s/ Denise M. De Mory_____
18                                   Teresa M. Corbin
                                     Denise M. de Mory
19                                   Jaclyn C. Fink

20                                   Attorneys for Plaintiff SYNOPSYS, INC.
                                     and Defendants AEROFLEX INCORPORATED,
21                                   AEROFLEX COLORADO SPRINGS, INC., AMI
                                     SEMICONDUCTOR, INC., MATROX ELECTRONIC
22                                   SYSTEMS, LTD., MATROX GRAPHICS INC.,
                                     MATROX INTERNATIONAL CORP. and MATROX
23                                   TECH, INC.

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1   Dated: November 16, 2005          DICKSTEIN SHAPIRO MORIN & OSHINSKY, LLP

2                                     By: /s/ Kenneth W. Brothers
                                      Gary Hoffman (*pro hac vice*)
3                                     Kenneth W. Brothers (*pro hac vice*)
                                      Edward M. Meilman *(pro hac vice)*
4
                                      ALTSHULER, BERZON NUSSBAUM, RUBIN &
5                                     DEMAIN
                                      Jeffrey B. Demain
6
                                      Attorneys for Plaintiff and Defendant
7                                     RICOH COMPANY, LTD.

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9   GOOD CAUSE APPEARING THEREFORE,

10       IT IS HEREBY ORDERED THAT THE SECOND AMENDED PRETRIAL ORDER IS

11  AMENDED TO REFLECT THE SCHEDULE SET FORTH ABOVE.

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13
                                      By:  _____
14                                         Martin L. Jenkins
                                           United States District Court Judge
15  Dated: _____, 2005

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